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ENVIRONMENTAL ENGINEERING

February 25, 1985

Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

ATTN: Jeanette Virgilio

Re: Brighton Landfill

Dear Jeanette:

Per our recent telephone conversation, attached is a copy of the Brighton Landfill Compliance Plan for complying with the prohibition on liquid hazardous waste landfilling. The plan has been modified as you had requested.

Thank you for your consideration in this matter. Should you have any further questions, please contact me at this office.

Sincerely,

Daniel V. Flynn

Daniel V. Flynn
M. RAPPS ASSOCIATES, INC.

DVF/jh

cc: Brighton Landfill

RECEIVED

FEB

BRIGHTON LANDFILL

COMPLIANCE PLAN

35 IL Administrative Code Rule 729.302

"Liquid Hazardous Wastes Prohibitions"

RECEIVED
FEB 27 1985
IEPA-DLPC

(Revised) February, 1985

SECTION I: Introduction

Effective July 1, 1984, 35 Illinois Adminstrative Code Rule 729 prohibits the landfilling of liquid hazardous waste (unless specific authorization is obtained from the Illinois Environmental Protection Agency), specifies the circumstances under which the residual from the treatment of a liquid hazardous waste may be landfilled, and bans the landfilling of any waste which contains liquids into a landfill permitted to receive hazardous waste. Further, Rule 729 requires landfill operators to have and follow a written waste analysis plan describing the procedures that will be carried out to comply with the provisions of this Rule. The written waste analysis plan is to include specific testing procedures to determine the presence of liquids. These testing procedures are outlined by Rule 729 and are required items to be included in the waste analysis plan.

Section II of this document is the Waste Screening and Analysis Plan that will be used by Brighton Landfill to comply with Rule 729. Brighton Landfill will implement the provisions of the plan whenever shipments of special and hazardous waste arrive at their facility from original generators and treaters. Original generators are persons who generate special/hazardous waste as a result of activities or production processes other than the treatment of special/hazardous waste. Treaters are persons who engage in the treatment of

special/hazardous waste. A treater is a generator, but may not be the original generator. Since Brighton Landfill does not presently treat liquid waste, the Waste Screening and Analysis Plan does not include provisions for testing residuals resulting from on-site treatment. However, upon construction of a liquid waste treatment system at the facility, the Waste Screening and Analysis Plan will be amended to include provisions for testing residuals from on-site liquid waste treatment.

SECTION II: Waste Screening and Analysis Plan

1. Upon the arrival of a special/hazardous waste shipment the information on the accompanying manifest will be compared to the Illinois Environmental Protection Agency (IEPA) supplemental permit issued for the wastestream. If no supplemental permit exists for the waste or the manifest does not match the information from the supplemental permit, the waste will be returned to its origin.

2. All shipments of IEPA permitted special/hazardous waste will be tested for liquids per the procedures outlined in Appendix I.

3. Shipments of IEPA permitted hazardous waste from generators who treat their liquid hazardous waste and treaters of liquid hazardous waste will also be tested per the load-bearing capacity test procedures outlined in Appendix II. NOTE: Generators who treat their liquid hazardous waste and treaters of liquid hazardous waste will be required by Brighton Landfill to provide (prior to the arrival of the initial shipment) a copy of the IEPA "Wastestream Authorization" issued for the wastestream. This document will indicate whether the paint filter test or the load-bearing capacity test (or both) will be required to be performed on the shipments of the wastestream. Brighton Landfill will perform the indicated test(s) to insure compliance with the prohibition on liquid hazardous waste landfilling.

All copies of wastestreams authorization submitted to Brighton Landfill will be kept with the landfill records pertaining to the wastestreams.

4. Waste shipments that fail the tests performed per parts 2 and 3 of this plan will be returned to the respective generator or treater. The results of all tests performed will be kept with the landfill records.

APPENDIX I

A. Apparatus

- Ring stand 10 cm in diameter
- 5 ounce wax-coated paper cups (disposable)
- 400 micron conical paint filter approximately 15 cm in diameter (disposable)
- Watch glass
- Disposable polyethylene gloves
- Wooden tongue depressors (disposable)
- Paper towels (disposable)

B. Procedure

1) Put disposable polyethylene gloves on both hands.
2) Fill a 5 ounce wax-coated paper cup two-thirds full (approximately 3.4 ounces) with a representative sample of the waste. If needed, use a wooden tongue depressor as a spatula when dealing with a sludge.
3) Mix the sample thoroughly with the wooden tongue depressor.
4) Bring the sample into the office.
5) Bring the sample and the paint filter to a temperature of not less than 68°F.
6) Place the paint filter in the ring stand. Position paper towels beneath the ring stand.
7) Place the sample in the paint filter and cover with the

watch glass.

8) Maintain the sample and the filter at a temperature of not less than 68° for five minutes.

9) Observe whether any fluid drops from the bottom of the paint filter during the five minute time period. Should any fluid drop from the bottom of the paint filter, the tested waste is a Liquid Hazardous Waste and therefore is prohibited from being landfilled.

10) Once waste analysis test is completed, return any waste remaining in the paint filter back to the waste shipment.

11) Place used gloves, paper cup, paint filter, tongue depressor, and paper towels into a large plastic bag.

NOTE: When plastic garbage bag is full, take bag to the hazardous waste fill area for disposal.

APPENDIX II

A. Apparatus

- Soil penetrometer with a range of 0 to 4.5 tons per square foot.
- Cylindrical Mold, 4.0 in. diameter with 2.0 in. extension collar.
- Compaction Hammer, 5.5 lb. weight.
- Soil Scoop or Shovel.
- Disposable Polyethylene Gloves.
- Wooden Tongue Depressors (Disposable).
- Paper Towels (Disposable).

B. Procedure

1) Put disposable polyethylene gloves on both hands.
2) If the treatment residual is a monolithic solid (i.e. very small void spaces), collect a representative sample using the soil scoop or shovel and fill the cylindrical mold (extension collar attached). If the treatment residual is a granular material, collect a representative sample using the soil scoop or shovel and fill and compact the residual into the cylindrical mold (extension collar attached) according to the following:

Compact the residual using the compaction hammer in three layers of approximately equal height. Each layer shall receive 25 blows. The total amount of residual used shall be such that the third compacted layer is slightly above the top of the mold, but not exceeding 1/4 in. During compaction the mold shall rest on the ground or on a base of concrete. In operating the compaction hammer, care shall be taken to avoid rebound of the rammer, from the top end of the guidesleeve. The guidesleeve shall be held steady and within 5 deg. of vertical. Apply the blows at a uniform rate not exceeding approximately 1.4 sec. per blow and in such a manner as to provide complete coverage of the treatment residual surface.

3) After the cylindrical mold has been filled with treatment residual (or if compaction is completed) remove the extension collar and carefully trim the compacted residual even with the top of the mold by using a tongue depressor as a straightedge.

4) Place the cylindrical mold on a level area of ground.

5) Grasp the penetrometer by the handle and vertically push the point into the treatment residual by hand, at a constant rate, up to the calibration mark. (The penetration point should be placed away from the edge

of the mold, near the center, so as to leave space for three more penetrations).

6) Read and record the value on the low-load side of the indicator ring on the penetrometer.

7) Return the indicator ring to its initial position for the next penetration.

8) Penetrate the treatment residual with the penetrometer at least 3 more times. Record each value indicated.

9) Average the results to arrive at a final test value. Should the final test value be less than 2.0 tons per square foot, the treatment residual cannot be landfilled.

10) Return the treatment residual from the compaction mold to the shipment.

11) Clean the soil scoop or shovel, compaction mold, extension collar, compaction hammer, and penetrometer with paper towels.

12) Place used gloves, tongue depressor, and paper towels into a large plastic bag. NOTE: When plastic bag is full, take bag to the hazardous waste fill area for disposal.